

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA**

---

<i>Beach, et al.,</i>	)	
	)	Case No. 13-185 (JNE/TNL)
v.	)	
	)	
<i>Hunt, et al.</i>	)	
	)	Case No. 13-389 (JNE/TNL)
<i>Davis-Dowling, et al.,</i>	)	
	)	
v.	)	
	)	
<i>Hunt, et al.</i>	)	
	)	
	)	
<i>Sapp, et al.,</i>	)	Case No. 13-286 (JNE/TNL)
	)	
v.	)	
	)	
<i>Hunt, et al.</i>	)	
	)	
<i>Whigham, et al.</i>	)	Case No. 13-208 (JNE/TNL)
	)	
v.	)	
	)	
<i>Hunt, et al.</i>	)	
	)	
<i>Kiminski et al.</i>	)	Case No. 13-358 (JNE/TNL)
	)	
v.	)	
	)	
<i>Hunt, et al.</i>	)	

---

## **MOTION TO DISMISS**

Pursuant to Fed. R. Civ. Proc 12(b)(6), defendants Tom Landwehr, Ramona Dohman, Mark Holsten, Michael Campion, Rodmen Smith, James Konrad, Keith Parker, Robert Maki, Steve Lime, Charlie Regnier, Stan Gruska, and Sheila Deyo (the State Defendants”) move to dismiss the amended complaint in this matter for failure to State a claim on which relief can be granted. The bases for the State Defendants’ motion are set forth in the State Defendants’ Memorandum In Support of Their Motion to Dismiss.

Dated: April 30, 2013

Respectfully submitted,

OFFICE OF THE ATTORNEY GENERAL  
State of Minnesota

s/ Oliver J. Larson

OLIVER J. LARSON  
Assistant Attorney General  
Atty. Reg. No. 0392946

JOHN S. GARRY  
Assistant Attorney General  
Atty. Reg. No. 0208899

JOHN R. MULÉ  
Assistant Attorney General  
Attorney Reg. No. 0393031

445 Minnesota Street, Suite 1800  
St. Paul, Minnesota 55101-2134  
(651) 757-1265 (Voice)  
(651) 282-2525 (TTY)

ATTORNEYS FOR THE STATE  
DEFENDANTS

**Certificate of Service**

Oliver J. Larson certifies that a copy of the foregoing Notice of Motion, along with the Motion to Dismiss, the State Defendants' Memorandum In Support of Their Motion to Dismiss, the State Defendants' Meet and Confer Certification, and State Defendants' Rule 7.1 Certification were served on April 30, 2013 on all parties of record by ECF.

Dated: April 30, 2013

s/ **Oliver J. Larson**

Oliver J. Larson